

1 PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only
2 notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without
3 limitation, all orders and notices of any application, motion, petition, pleading, request,
4 complaint, or demand, statements of affairs, operating reports, schedules of assets and liabilities,
5 whether formal or informal, whether written or oral and whether transmitted or conveyed by
6 mail, hand delivery, telephone, facsimile transmission, email, or otherwise, that affect, or may
7 potentially affect, the Debtor or the property of the Debtor.

8 PLEASE TAKE FURTHER NOTICE that request is also made that the attorney
9 identified herein be added to the official service list for notice of all contested matters, adversary
10 proceedings, and other proceedings in the above-captioned cases.

11 PLEASE TAKE FURTHER NOTICE that the attorney identified herein consents to e-
12 mail service.

13 PLEASE TAKE FURTHER NOTICE that the Appearing Party does not, by filing this
14 Request for Special Notice and Notice of Appearance or any later appearance, pleading, claim
15 or suit, submit to jurisdiction of the Bankruptcy Court, or intend to waive any of its rights,
16 including: (i) the right to have final orders in non-core matters entered only after *de novo* review
17 by a district judge; (ii) the right to trial by jury in any proceeding so triable herein, or in any case,
18 controversy or proceeding related hereto; (iii) the right to have the reference withdrawn by the
19 District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other
20 rights, claims, actions, defenses, set-offs, or recoupments to which the Appearing Party is or may
21 be entitled under any agreement, in law, or in equity, all of which rights, claims, actions,
22 defenses, set-offs, and recoupments the Appearing Party expressly reserves.

23 Respectfully submitted,

24 Dated: May 11, 2023

MAURICE WUTSCHER LLP

25
26 /s/ Alan C. Hochheiser

Alan C. Hochheiser (OH Bar #0041222)

Attorneys for City Capital NY
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Certificate of Service

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the County of Cuyahoga, Ohio; my business address is 23611 Chagrin Blvd. Suite 207, Beachwood, OH 44122.

On the date below I served a copy, with all exhibits, of the following document(s):

Request for Special Notice and Notice of Appearance

On all parties in said case addressed as follows:

Joon M Khang KHANG & KHANG LLP 4000 Barranca Parkway, Suite 250 Irvine, CA 92604	Queenie K Ng 411 West Fourth St. Suite 7160 Santa Ana, CA 92701
United States Trustee (SA) 411 Fourth Street, Suite 7160 Santa Ana, CA 92701	The Litigation Practice Group P.C. 17542 17th St Suite 100 Tustin, CA 92780
Richard A Marshack (TR) Marshack Hays LLP 870 Roosevelt Irvine, CA 92620	

☐ **(BY ELECTRONIC MAIL)** I personally e-mailed the above-referenced documents to the recipients identified herein.

☒ **(BY U.S. MAIL)** I caused to be deposited the sealed envelope, with postage thereon fully prepaid, with the United States Postal Service in Cleveland, Ohio.

☐ **(BY OVERNIGHT MAIL)** I caused the enclosed documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses herein. I caused the envelope or package to be placed for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. This declaration is executed on **May 11, 2023**.

/s/ Alan C. Hochheiser

Alan C. Hochheiser